# **ORIGINAL**

# FIBERMET

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211 LEON SULLIVAN WAY . CHARLESTON, WV 25301 . 304.720.2101 . FAX: 304.720.2121

January 22,2003

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JAN 23 2003

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#### Ex Parte - Via Overnight Mail

Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

Re: WC Docket No. 02-384, Application by Verizon Maryland Inc., Verizon Washington D.C. Inc., Verizon West Virginia Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services, Inc., for Authorization to Provide In-Region, InterLATA Services in Maryland, Washington, D.C., and West Virginia

Dear Ms. Dortch:

The purpose of this ex parte letter is to provide clarification and additional information for two issues raised by FiberNet, LLC ("FiberNet") in its January 9, 2003 comments in the above-captioned proceeding. Specifically, the information being provided relates to the discussions regarding "M-Loop and Facility Reuse" found on pages 19-23 of FiberNet's January 9, 2003 comments as well as the discussion relating to Verizon West Virginia Inc.'s refusal to provide "dialing parity" found on pages 55-60 of FiberNet's comments.

With respect to the issue of M-Loops, FiberNet has appended hereto as Attachment 1 a network diagram that illustrates how the M-Loop is designed to function. Specifically, the M-Loop is to function much like an Enhanced Extended Loop or EEL. Under the M-Loop scenario, FiberNet would order a DS-1 facility from Verizon West Virginia. FiberNet would then break down each of the 24 channels associated with this DS-1 to a DS-0 level for use as individual loops to serve end user customers. FiberNet is using this M-Loop product to transfer existing resale customers to on-net facilities.

On the dialing parity issue, FiberNet has included several informational items as requested by the Wireline Competition Bureau staff that demonstrates that FiberNet's onnet customers in certain recognized EAS areas in West Virginia are not able to utilize the same dialing parity arrangements as those enjoyed by similarly situated Verizon West Virginia end users. Appended hereto as Attachment 2 are sections taken from Verizon West Virginia's current Local Exchange Services Tariff, P.S.C.-W.Va.-No. 202, showing the exchanges and local calling areas for its end users in Huntington, Parkersburg,

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38 Fifteenth Street
Suite 2 w
Wheeling, WV 26003

304,2302101 Fax: 3M 230.2114 7003 Broad Street Suite 124 Johnstown, PA 15906 814,361.2101 Marlene H. Dortch January 22,2003 Page 2

## **ORIGINAL**

Weirton and Wheeling, West Virginia, respectively. As can be seen from Verizon West Virginia's tariff, Verizon West Virginia's end users have as part of their recognized local calling areas corresponding exchanges located in the State of Ohio.

In addition, appended hereto as Attachment 3, FiberNet has included information taken from the appropriate Verizon West Virginia telephone directories for Huntington, Parkersburg, Weirton and Wheeling, West Virginia, which again shows the scope of the recognized local calling areas for Verizon West Virginia's end user customers. Again, as was the case with the above-referenced tariff pages, Verizon West Virginia's recognized local calling areas in these communities in West Virginia extend to corresponding EAS wire centers located in the State of Ohio.

FiberNet has also appended hereto as Attachment 4 a series of three network diagrams showing 1) the network situation as it existed in Huntington, West Virginia from 2000-2001; 2) the network situation in Huntington, West Virginia following the implementation of the Verizon West Virginia "work around"; and 3) the network situation or "desired fix" that FiberNet believes should have been used by Verizon West Virginia all along in properly addressing these interstate EAS situations between West Virginia and Ohio.

Lastly, FiberNet has appended hereto as Attachment **5** a document outlining the additional expense that FiberNet has been forced to incur as a direct result of Verizon West Virginia's decision to block FiberNet's on-net end users in Huntington, Parkersburg, Weirton and Wheeling, West Virginia from being able to place local calls to the corresponding EAS areas located in the State of Ohio. As can be seen from this particular attachment, FiberNet has spent approximately \$364,000 to date in combating Verizon West Virginia's discriminatory and anti-competitive practice.

Please feel free to contact me directly if the Staff has any other questions of FiberNet regarding either of these two issues. The 20-page limit does not apply to this filing.

Sincerely yours,

STEVEN HAMULA

Director of Regulatory Affairs

FiberNet, LLC

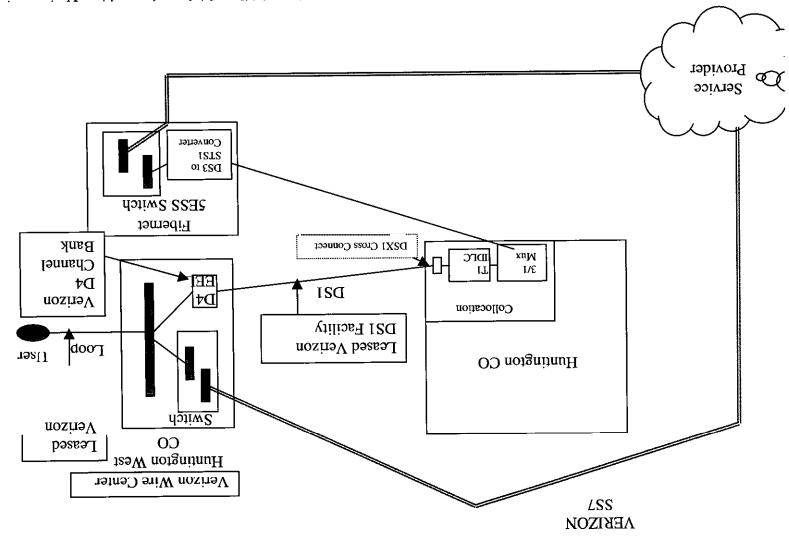
SH/s

Attachments

# ORIGINAL

**ATTACHMENT 1** 

M-LOOP DIAGRAM



M-Loop is a term used to describe a UNE loop connected to a leased 1/0 multiplexer located in a Verizon wire center where a CLEC is not collocated. The multiplexer and the connecting Hi-Cap facility are leased from Verizon to connect a DS1 from a collocation in one Verizon wire center to the leased multiplexer located in another Verizon wire center the CLEC is not collocated. The 2W VG POTS loop is leased and connected to the leased multiplexer in the non-collocated wire center to the customer demarcation point.

# <u>ATTACHMENT 2</u> VERIZON WEST VIRGINIA TARIFF PAGES

Verizon West Virginia Inc.

Section 2 Original Page 57

#### LOCAL EXCHANGE SERVICE

#### B. REGULATIONS (Cont'd)

4. Exchanges and Zones of Area Exchanges (Cont'd)

Huntington Zone II - See BARBOURSVILLE Huntington Zone IV - See KENOVA

Exchange and	Flat Rate Local		Measured	Rate Local Ser	rvice Area	
<u>Plan Options</u>		Band 1	Band 2	Bard3	Band 4	Bard5
HUNTINGTON	(HuntingtonZone I	)				
Residence						
Plan 1	None	Huntington Area Zone I	Chesapeake (Ohio) Huntington Area Zones II & IV	Prichard Union Ridge Wayne*	Branchland* East Lynn* Hamlin* Milton	None
Plan 2	Huntington <b>Area</b> Zone I	None	Same as for F	lan 1, Bands 2	, 3, 4 and 5 pm	eceding.
Plan 3	Chesapeake (Ohio) Huntington Area All zones Milton Prichard Union Ridge	None	None	Wayne*	Branchland* East Lynn* Hamlin*	None
Plan 4	Branchland* Chesapeake (Ohio) East Lynn* Hamlin* Huntington Area All zones Milton Prichard Union Ridge Wayne*	None	None	None	None	None

\* Independent company exchange.

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Verizon West Virginia Inc.

Section 2 Original Page 57a

#### LOCAL EXCHANGE SERVICE

В.	REGULATIONS	(Cont'd)
□.	TCH GOLLTT I OIVD	(COME a)

4. Exchanges and Zones of Area Exchanges (Cont'd)

Exchange and	Flat Rate Local		<u>Measur</u> e	d Rate Local S	ervice Area	
Plan Options	Service Area	Band 1	Band 2	Band 3	Band 4	Band 5
HUNTINGTON	(Huntington zone	I) (Cont'd)				
Business						
Plan 1	None	Same as for 1	residence Plan	1, Bands 1, 2	, 3,4 <b>an</b> d 5 pr	receding.
Plan 2	Branchland* Chesapeake (Ohio) East Lynn* Hamlin* Huntington Area All zones Milton Prichard Union Ridge Wayne*	None	None	None	None	None
Pay Telephone	Same as for Business	None	None	None	None	None
Network Lines	Plan 2					

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<sup>\*</sup> Independent company exchange.

Verizon West Virginia Inc.

Section 2 Original Page 92a

#### LOCAL EXCHANGE SERVICE

B. REGULATIONS (C	Cont'd)
-------------------	---------

4. Exchanges and Zones of Area Exchanges (Cont'd)

Exchange and	Flat Rate Local		Measured	l Rate <b>Local</b> Se	rvice Area	
Plan Options	Service Area	Band 1	Bud2	Band 3	B u d 4	Bud5
PARKERSBURG ZONE I (Par	G AREA Rkersburg) (Cont'd)					
Business	(Cont'd)					
plan 2	Belpre (Ohio) Elizabeth Mineral Wells Parkersburg Area All zones Rockport* Valley Mills Williamstown	None	None	None	Belmont* Cairo* St. Marys*	None
Pay Telephon Network Lines	Belpre (Ohio) e Mineral Wells Parkersburg Area All zones Rockport* Valley Mills Williamstown	None	None	None	None	None

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<sup>\*</sup> Independent company exchange

Verizon West Virginia Inc.

Section 2 Original Page 93

#### LOCAL EXCHANGE SERVICE

Β.	DECLI	ATIONIC	(Cont'd)
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4. Exchanges and Zones of Area Exchanges (Cont'd)

Parkersburg Zone II - See DALLISON Parkersburg Zone III - See LUBECK

Exchange and	Flat Rate Local		Measured	Rate Local Ser	rvice Area	
	Service Area	sard1	Band 2	sard3	Pard4	Band 5

PARKERSBURG (Parkersburg Zone I)

Residence

Plan 1	None	Parkersburg Area Zone I	Belpre (Ohio) Mineral Well Parkersburg Area Zones TI & III Valley Mills		Belmont* Cairo* Elizabeth St. Marys*	None
Plan 2	Parkersburg Area Zone I	None	Same as for P	lan 1, Bands 2,	3, 4 and 5 pre	eceding.
Plan 3	Belpre (Ohio) Elizabeth Mineral Wells Parkersburg Area All zones Rockport* Valley Mills Williamstown	None	None	None	Belmont* Cairo* St. Marys*	None
Plan 4	Belmont* Belpre (Ohio) Cairo* Elizabeth Mineral Wells Parkersburg Area All zones Rockport* St. Marys* Valley Mills Williamstown	None	None	None	None	None

<sup>\*</sup> Independent company exchanges

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in Case No	o				dat	e d					
					-						

Verizon West Virginia Inc.

Section 2 Original Page 93a

#### LOCAL EXCHANGE SERVICE

R	REGIILATIONS	(Contid)

4. Exchanges and Zones of Area Exchanges (Cont'd)

Exchange and Plan Options	Flat pate Local Service Area	Band 1	<u>Measured</u> Band 2	Pate Local. Ser Band 3	vice Area Band 4	Bard5
PARKERSBURG	(Parkersburg Zone	I) (Cont'd)				
Business (Co	ont'd)					
Plan 1	None	Same as for re	sidence Plan 1	1, Bands 1, 2,	3, 4 and 5 prec	peding.
	Belmont* Belpre (Ohio) Cairo* Elizabeth Mineral Wells Parkersburg Area All zones Rockport* St. Marys* Valley Mills Williamstown	None	None	None	None	None
_	Same as for Business Plan 2.	None	None	None	None	None

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<sup>\*</sup> Independent company exchange.

Verizon West Virginia Inc.

Section 2 Original Page 128

#### LOCAL EXCHANGE SERVICE

#### B. REGULATIONS (Cont'd)

4. Exchanges and Zones of Area Exchanges (Cont'd)

Exchange and	Flat Fate Local		Measured	Rate Local Se	ervice <b>Area</b>	
Plan Options	Service Area	Band 1	Bard2	Band 3	Bard4	Band 5
WEIRTON						
Residence						
Plan 1	None	Weirton	Follansbee New Cumber- land Paris, PA Steubenville OH Wellsburg	Chester	cmWheeling Area Zone II	None
plan 2	Weirton	None	Same as for P	lan 1, Bands	2, <b>3,4</b> & 5 pre	eceding.
plan 3	Follansbee New Cumberland Paris, PA Steubenville, OH Weirton Wellsburg	None	None	Same as for preceding.	Plan 1, Bands	3,4&5
Plan 4	Beech Bottom Bethany Chester Follansbee New Cumberland Paris, PA Steubenville, OH Weirton Wellsburg Wheeling Area Zone II	None	None	None	None	None

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in Case No	•				dat	ed					

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Section 2 Original Page 128a

#### LOCAL EXCHANGE SERVICE

B. REGULATIONS	(Cont'd)
----------------	----------

4. Exchanges and Zones of Area Exchanges (Cont'd)

Exchange and	Flat Rate Local		Measure	d Fate Local S	ervice Area	
Plan Options	Service Area	Bard1	Bard2	Band 3	Bard4	Band 5
WEIRTON (Co	nt'd)					
Business						
Plan 1	None	Same as for m	residence Pl <i>a</i> n	1, Bands 1, 2	, 3, 4 & 5 preo	eding.
Plan 2	Beech Bottom Bethany Chester Follansbee New Cumberland Paris, PA Steubenville, CH Weirton Wellsburg Wheeling Area Zone II	None	None	None	None	None
Pay Telephone Network Lines	Same as for Business Plan 2.	None	None	None	None	None

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in Case	e No	·					dat	ed					

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Section 2 Original Page 135

#### LOCAL EXCHANGE SERVICE

В.	REGULATIONS	(Cont.	d)

4. Exchanges and Zones of Area Exchanges (Cont'd)

Wheeling Zone II - see WEST LIBERTY Wheeling Zone III - see TRIADELPHIA Wheeling Zone V - see MOUNDSVILLE

Exchange and	Flat Rate Local		<u>Measured</u>	. Rate <b>Local</b> Sei	rvice Area	
Plan Options	Service Area	Bard1	Band 2	Bard3	Band 4	Bard5

Wheeling Area Wheeling Area Beech BottorCameron\*

WHEELING (Wheeling Zone I)

Plan 1 None

Residence

Fiail I	IV.J.IC	Zone I (Wheeling	Zone ) I (Wheeling II (West Liberty III (Triadelphia) VI Eellaire VII (Bridge Port, (Martins Ferrys OH) VIII (St. C	Bethany g) Wheeling Area Zone V (Mound Ville , OH CH	Follansbee Wellsburg s-	NOTE
Plan 2	Wheeling Area Zone I (Wheeling)	None	Same as for preceding.	Plan 1, Band	ls 2, 3, 4 and	d 5
Plan 3	Beech Bottom Bethany Wheeling Area Zone I (Wheeling) II (West Liberty III (Tria- delphia) V (Mounds- Ville) VI (Eellaire,	None	None	None	Cameron* Follansbee Wellsburg	None

\* Independent company exchange.

OH)
VII (BridgePort, OH
&
Martins
Ferrys,
OH)

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Verizon West Virginia Inc.

Section 2 Original Page 135a

Effective: January 8, 2001

#### LOCAL EXCHANGE SERVICE

В.	REGULATIONS	1000+1d1	
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Issued: January 8, 2001

4. Exchanges and Zones of Area Exchanges (Cont'd)

	Flat Rate Local	Down 1		ed Rate Local S		
Plan Options	Service Area	Band 1	Band 2	Band 3	Band 4	I
WHEELING (	WheelingZone I) ((	Cont'd)				
Residence	(Cont'd)					
Plan 3	VIII (St. Clair- ville, OH)					
Plan 4	Beech Bottom Bethany Cameron* Follansbee Wellsburg Wheeling Area Zones I (Wheeling) II (West Liberty V (Mounds- Ville) VI (Bellaire, OH) VII (Bridge- Port, OH & Martins Ferrys, OH) VIII (St. Clair- ville, OH)	None	None	None	None	Non
Business						
Plan 1	None	Same as for	residence Pla	n 1, Bands 1, 2	2, 3, 4 and 5 p	recedi
Plan 2	Beech Bottom  Bethany Cameron* Follansbee Wellsburg Wheeling Area Zones I (Wheeling) II (West Liberty	None	None	None	None	Nor

Verizon West Virginia Inc.

Section 2 Original Page 135b

#### LOCAL EXCHANGE SERVICE

- B. REGULATIONS (Cont'd)
  - 4. Exchanges and Zones of Area Exchanges (Cont'd)

Exchange and	Flat Rate Local		Measure	d Rate Local Se	ervice Area	
Plan Options	Service Area	Band 1	Band 2	Band 3	Band 4	Band 5
WHEELING (	WheelingZone I) ((	Cont'd)				
Business (C	ont'd)					
Plan 2	Wheeling Area Zones III (Tria- delphia) V (Mounds- Ville) VI (Bellaire, OH) VII (Bridge- Port, OH & Martins Ferrys, OH) VIII (St. Clair ville, OH) & Martins Ferrys, OH)					
Pay Telephone Network Lines	Same as For Business Plan 2	None	None	None	None	None

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## **ATTACHMENT 3**

VERIZON WEST VIRGINIA TELEPHONE DIRECTORY PAGES

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Local Calling	Area				<u></u>	
A VERIZON	DIS- TANCE BANDS	YOUR LOCAL CALLING AREA INCLUDES: (CHARGES FOR CALLS TO THESE NUMBERS DEPEND ON YOUR HOME PHONE SERVICE. SEE DESCRIPTION OF SERVICE PLANS ON PAGE 10)	IF YOU ARE A VERIZON CUSTOMER CALLING FROM;		YOUR LOCAL CALLING AREA INCLUDES: (CHARGES FOR CALLS TO THESE NUMBERS OEPENDONYOURHOMEPHONESERVICE. SEE DESCRIPTION OF SERVICE PLANSON PAGE 10)	
Area Code 304 Barboursville	ea Code 304 1 Area Code 304 Barboursville'		Area Code 304 Huntlimgttom		Area Code 304 Huntington*	
ibai boursville	2	Area Code 304  Huntington., Milton*, Union Ridge'   Area Code 740   Burlington, OH', Chesapeake, OH',		,	Area Code 304 Barboursville', Ceredo-Kenova' Area Code 740 Burlington, CH, Chesapeake, OH, Proctorville, OH	
į		Proctorville. OH*		1	Area Code 304 Prichard*, Union Ridge', Wayne	
	3	Area Code 304 Branchland, Ceredo-Kenova' Hamlin, Hurricane, Wayne		I	Area Code 304 Branchland, East Lynn, Hamlin, Milton'	
	4	Area Code 304 Apple Grove, East Lynn, Griffithsville. Prichard, Scott Depot	Area Code 304 Milton		Area Code 304 Milton'	
# ea Code 304 ( ?redo-Kenova	ſ	Area Code 304 Ceredo-Kenova'		1	Barboursville', Hurricane', Union Ridge'	
	2	Area Code 304 Huntington' Area Code 740		3	Area Code 304 Apple Grove, Branchland, Buffalo, Hamlin. Scott Depot, Winfield'	
		Burlington, OH', Chesapeake, OH*, Proctorville. OH'		4	Area Code 304 Alum Creek, Cross Lanes, Griffithsville, Huntington*, Nitro,	
	3	Area Code 304 Barboursville', Prichard*, Wayne	Area Code 304 Prichard	1	St. Albans, Wayne  Area Code 304	
	4	Area Code 304 East Lynn, Fort Gay, Union Ridge			Prichard*	
	Zaot Zymi, i ort day, dinominago			2	Area Code 304 Fort Gay'. Wayne'	
rea Code 304 ort Gay	1	Area Code 304 Fort Gay'		3	Area Code 304 Ceredo-Kenova', East Lynn, Huntington*	
	2	Area Code 304 Prichard*		4	Area Code 304 Barboursville, Branchland, Dunlow	
		Area Code 606 Louisa, KY'	NOTES:	hone e	onico companice local calling area men	
	3	Area Code 304 Dunlow*, East Lynn, Wayne*	different from the company for more calling prefixes shown on page 1	ephone service companies'local calling area may ne above. Contact your local telephone Service ore specific local calling area information. s associated with exchange areas listed above are		
	4	Area Code 304 Ceredo-Kenova, Kermit	Although we may the ever-changing	ke ever g natur	y effort to maintain the accuracy of these lists $e \circ f$ the telephone industry makes it impos- 0% accuracy. Please call our Business Office	

- about any billing discrepancies you may encounter.
- No charge for calls to this exchange area for Community Plus Caller Service. See description of Community Plus Caller Service on page 10.



#### **Local Calling Area**

IF YOU ARE A VERIZON CUSTOMER CALLING FROM:	DIS- TANC BANC	YOUR LOCAL CALLING AREA INCLUDES: (CHARGES FOR CALLS TO THESE NUMBERS DEPEND ON YOUR HOME PHONE SERVICE, SEE DESCRIPTION OF SERVICE PLANS ON PAGE 10)
Area Code 304 Union Ridge	1	Area Code 304 Union Ridge'
	2	Area Code 304 Barboursville', Milton*
	3	Area Code 304 Apple Grove, Huntington*, Hurricane
	4	Area Code 304 Branchland, Buffalo, Ceredo-Kenova Hamlin, Leon, Scott Depot, Winfield

#### NOTES:

- Some local telephone service companies' local calling area may differ from the above. Contact your local telephone service company for more specific local calling area information,
- Calling prefixes associated with exchange areas listed are shown below.
- Although we make every effort to maintain the accuracy of these lists, the ever-changing nature of the telephone industry makes it impossible for us to ensure 100% accuracy. Please call our Business Office about any billing discrepancies you may encounter.
- \* No charge for calls to this exchange area for Community Plus Caller Service. See description of Community Plus Calle Service on page 10

#### Local Calling Exchanges — Area Codes 304,606 & 740

#### Area Code 304

Apple Grove 576	Ceredo-Kenova 453	Fort Gay 648,764	Huntington 208,399,429,521,	Kermit <b>393</b>	Scott Depot 757,760
Barboursville 302,733,736	Dunlow 385	Griffithsville 524	522, 523, 525, 526, 528, 529,690,691, 696, 697, 781, 840,	Milton 209,743	Union Ridge 762
			942		10/2002
Branchland	East Lynn	Hamlin		Prichard	Wayne <b>272</b>
778	849	824	Hurricane	486	LIL

#### Area Code 606

Louisa, KY 458,638,826,989

#### Area Code 740

Burlington, OH a94

Chesapeake, OH 867

Proctorville, OH 886

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#### **Local Calling Area**

F YOU ARE A VERIZON CUSTOMER CALLING FROM:	DISTANCE BANDS	YOUR LOCAL CALLING AREA INCLUDES: (CHARGES FOR CALLS TO THESE NUMBERS DEPEND ON YOUR HOME PHONE SERVICE. SEE DESCRIPTIONS OF SERVICE PLANS ON PAGE 11).
Area Code 304	1	Dallison*
Dallison	2	Mineral Wells', Parkersburg', Valley Mills'
Dallison		· · · · · · · · · · · · · · · · · · ·
	3	Belmont, Cairo, Elizabeth, Lubeck', Rockport, St. Marys, Williamstown
	4	Ellenboro, Harrisville, Srnithville
	_	Area code 740
	3	Belpre, OH'
Area Code 304	]	Elizabeth*
Elizabeth	2	Rockport
Liizabotti	3	Cairo, Dallison, Mineral Wells'
	1	Grantsville, Harrisville, Lubeck, Parkersburg*, Ravenswood, Smithville,
	4	Spencer, Valley Mills
		Spericer, valley wills
Area Code 304	1	Lubeck*
Lubeck	2	Mineral Wells', Parkersburg'
	3	Dallison*, Rockport', Valley Mills", Williamstown
	4	Belmont, Elizabeth, Ravenswood
	·	Area code 140
	•	
	2	Belpre, OH*
Area Code 304	1	Mineral Wells"
Mineral Wells	2	Dallison*, Lubeck', Parkersburg', Rockport*
	3	Elizabeth., Williamstown, Valley Mills
	4	Belmont, Cairo, Ravenswood, St. Marys
	7	·
	•	Area code 740
	2	Belpre, OH'
Area Code 304	1	Parkersburg*
Parkersburg	2	Dallison*, Lubeck', Mineral Wells', Valley Mills'
	3	Rockport*, Williamstown'
	4	Belrnont, Cairo, Elizabeth*, St. Marys
	•	Area code 740
	2	
	2	Belpre, OH*
	4	Pennsboro'
Area Code 304	l	i dilibbolo
Area Code 304 Pennsboro	2	
	2 3	Ellenboro', Harrisville' Cairo, Lawford, St. Marys

- Some local telephone service companies' local calling area may differ from the above. Contact your local telephone service
- company for more specific local calling area information.

  Calling prefixes associated with exchange areas listed above see page 20.

  Although we make every effort to maintain the accuracy of these lists, the ever-changing nature of the telephone industry makes it impossible for us to ensure 100% accuracy. Please call our business office about any billing discrepancies you may encounter.
- No charge for calls to this prefix for Community Plus Caller Service. See description of Community Plus Caller Service on page 11.



#### **Local Calling Area**

IF YOU ARE A VERIZON CUSTOMER CALLING FROM:	DISTANCE BANDS	YOUR LOCAL CALLING AREA INCLUDES: • (CHARGES FOR CALLS TO THESE NUMBERS DEPEND ON YOUR HOME PHONE SERVICE. SEE DESCRIPTIONS OF SERVICE PLANS ON PAGE 11).
Area Code 304	1	Valley Mills'
Valley Mills	2	Belmont, Dallison*, Parkersburg', Williamstown*
·	3	Cairo, Lubeck', Mineral Wells, St. Marys
	4	Elizabeth, Ellenboro, Harrisville, Rockport
		Area code 740
	3	Belpre. OH*
Area Code 304	1	Williamstown*
Williamstown	2	Valley Mills"
	3	Belmont, Dallison, Lubeck, Mineral Wells, Parkersburg*, St. Marys
	4	Cairo
		Area code 740
	2	Belpre, OH*

#### Notes:

- Some local telephone service companies' local calling area may differ from the above. Contact your local telephone service company for more specific local calling area information.
   Calling prefixes associated with exchanges areas listed above are shown below.
- Calling prefixes associated with exchanges areas listed above are shown below.

   Although we make every effort to maintain the accuracy of these lists, the ever-changing nature of the telephone industry makes it impossible for us to ensure 10% accuracy. Please call our business office about any billing discrepancies you may encounter.
- \* No charge for calls to this prefix for Community Plus Caller Service. See description of Community Plus Caller Service on page 11.

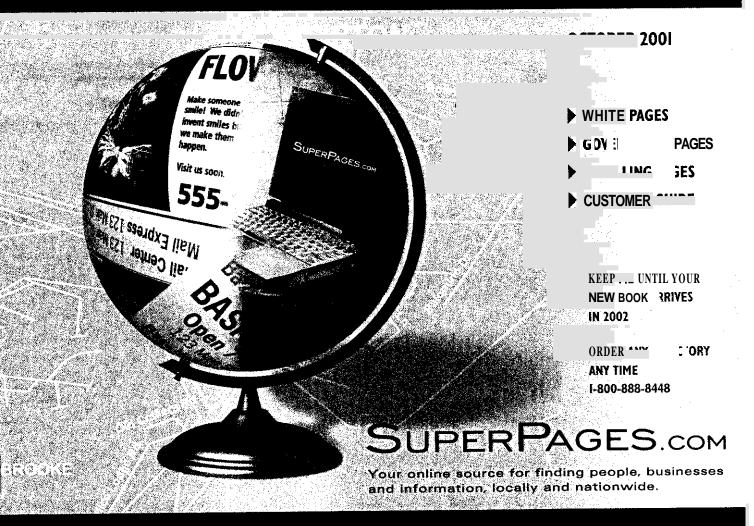
#### Local Calling Exchanges — AreaCodes 304 & 740

Area Code 304 Exchange	Code
Belmont	
Cairo	
Dallison	
Elizabeth	275
Ellenboro	
Grantsville	
Harrisville	643
Lawford	
Lubeck	861,863
Mineral Wells	489
Parkersburg	210, 295,420, 422, 424, 428,
	480, 485, 580, 699, 865, 893
Pennsboro	659, 835

Area Code 304	
Exchange	Code
Ravenswood	273,868
Rockport	474
St. Marys	
Smithville	411
Spencer	498,927
Valley Mills	
Williamstown	
Area Code 740	ماء ماء
Exchange	Code
Belpre, OH	401,423
Marietta, OH	373, 374, 376, 568

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Includes Complete Listings of All Local Exchange Telephone Companies

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IF YOU ARE 4 VERIZON CUSTOMER CALLING FROM:	ISTANCE ANDS	YOUR LOCAL CALLING AREA INCLUDES: * (CHARGES FOR CALLS TO THESE NUMBERS DEPEND ON YOUR HOME PHONE SERVICE. SEE DESCRIPTIONS OF SERVICE PLANS ON PAGE 10).	F YOU ARE VERIZON USTOMER ALLING FROM:	HSTANCE IANDS	YOUR LOCAL CALLING AREA INCLUDES: * (CHARGES FOR CALLS TO THESE NUMBERS DEPEND ON YOUR HOME PHONE SERVICE. SEE DESCRIPTIONS OF SERVICE PLANS ON PAGE 18).
Area Code 304	1	Area Code 304 Beech Bottom'	Area :ode 304	1	Area Code 304 New Cumberland*
Beech Bonom	2	Area Code 304 Bethany', Follansbee', Wellsburg*, West Liberty*	New Cumberland	2	Area Code 304 Chester*, Weirton*
	3	Area Code 304 Triadelphia, Weirton. Wheelina"	1	3	Area Code 304 Follansbee, Wellsburg
-	4	Area Code 304 Moundsville. New Cumberland		4	Area Code 304 Beech Bottom, Bethany
Area	1	Area Code 304 Bethany'	Area Code 304	1	Area Code 304 Weirton'
_	2	Area Code 304 Beech Bottom*, Follansbee', Wellsburg', West Liberty*	Neirton	2	Area Code 304 Follansbee*, New Cumberland'. Wellsburg* Area Code 724 (Pennsylvania)
	3	Area Code 304 Triadelphia, Weirton, Wheeling'			Paris*  Area Code 740 (Ohio)  Steubenville
	4	Area Code 304 New Cumberland		3	Area Code 304 Beech Bottom, Bethany, Chester
Area Code 304	1	Area Code 304 Chester"	Ī	4	Area Code 304 West Liberty
Chester	2	Area Code 304 New Cumberland' Area Code 330 (Ohio) East Liverpool", Wellsville*	Area Code 304 Wellsburg	1 2	Area Code 304 Wellsburg' Area Code 304
		Area Code 724 (Pennsylvania), Hookstown*, Smiths Ferry*		-	Beech Bottom', Bethany*, Follansbee*, Weirton', West Liberty*
	3	Area Code 304 Weirton		3	Area Code 304 New Cumberland, Triadelphia
	4	Area Code 304 Follansbee		4	Area Code 304 Wheeling
Area Code 304	1	Area Code 304 Follansbee"	Notes:		
Follansbee	2	Area Code 304 Beech Bottom'. Bethany', Weirton', Wellsburg* Area Code 740 (Ohio) Steubenville*	Some local tele     differ from the     for more speci     Calling prefixes     shown on the r     Although we m	above. C fic local c s associal next page nake ever	ervice companies' iocal calling area may ontact your local telephone Sewice compaling area information. ted with exchanges areas listed above are.  y effort to maintain the accuracy of these nature of the telephone industry makes it

- Although we make every effort to maintain the accuracy of these lists, the ever-changing nature of the telephone industry makes it impossible for us to ensure 100% accuracy. Please call our business office about any billing discrepancies you may encounter.
- No charge for calls to this prefix for Community Plus Caller Service. See description of Community Plus Caller Service on page 10.

3

4

Area Code 304

Area Code 304

New Cumberland, West Liberty

Chester, Triadelphia, Wheeling

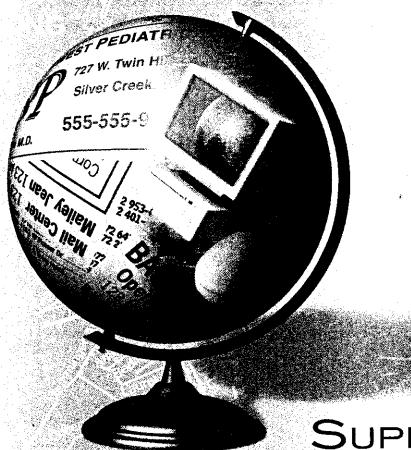


#### Local Calling Exchanges — Area Codes 304,330,740,724

Area Code 304		Area Code 330 (Ohio)	
Exchange	Code	Exchange	Code
Beech Bottom	394, 407	East Liverpool	382, 385, 386
Bethany	408, 829	Wellsville	532
Chester	387,616,714		
Follansbee	505, 527	Area Code 740 (Ohio)	
Moundsville	221, 843, 845	Exchange	Code
New Cumberland	316, 564	Steubenville	264, 266, 278, 282, 283, 284, 346
Triadelphia	219,547		
Weirton	604,723,740,748,794,797	Area Code 724 (Pennsyl	vania)
Wellsburg	605,737	Exchange	Code
West Liberty	217, 336	Hookstown	573,913
Wheeling	214, 230, 231, 232, 233, 234, 238,	Paris	370,414,729
	242,243,277,551,559	Smiths Ferry	764, 862

**Note:** Although we make every effort to maintain the accuracy of these lists, the ever-changing nature **of** the telephone industry makes it impossible for us to ensure 100% accuracy. Please call our Business Office about any billing discrepancies you may encounter.

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Moundsville

# WHEELING

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#### **Local Calling Area**

IF YOU ARE A VERIZON CUSTOMER CALLING FROM:	DISTANCE BANDS	YOUR LOCAL CALLING AREA INCLUES: * (CHARGES FOR CALLS TO THESE NUMBERS DEPEND ON YOUR HOME PHONE SERVICE. SEE DESCRIPTIONS OF SERVICE PLANS ON PAGE 10).
Area Code 304	1	Area Code 304 - Moundsville*
Moundsville	2	Area Code 740 - Bellaire, OH*
	3	Area Code 304 - Cameron, Triadelphia*, Wheeling'
		Area Code 740 - Bridgeport, OH', Martins Ferry, OH', St. Clairsville, OH'
	4	Area Code 304 - Beech Bottom, New Martinsville, West Liberty"
Area Code 304	1 .	Area Code 304 - Triadelphia'
Triadelphia	2	Area Code 304 - West Liberty*, Wheeling*
		<b>Area Code 740 -</b> Bellaire, OH*, Bridgeport, OH*, Martins Ferry, OH*
	3	<b>Area Code 304 -</b> Beech Bottom, Bethany, Cameron, Moundsville *, Wellsburg
		Area Code 740 - St. Clairsville, OH'
	4	Area Code 304 - Follansbee
Area Code 304	1	Area Code 304 – West Liberty'
West Liberty	2	Area Code 304 - Beech Bottom*, Bethany', Triadelphia*, Wellsburg', Wheeling*
		Area Code 740 ■ Bridgeport, OH*, Martins Ferry, OH'
	3	Area Code 304 - Follansbee
		Area Code 740 - Bellaire, OH*
	4	Area Code 304 - Moundsville', Weirton
		Area Code 740 - St. Clairsville, OH"
Area Code 304	1	Area Code 304 – Wheeling'
Wheeling	2	Area Code 304 Triadelphia*, West Liberty*
		Area Code 740 Bellaire, OH*, Bridgeport, OH, Martins Ferry, OH*, St. Clairsviile, OH'
	3	Area Code 304 - Beech Bottom*, Bethany', Moundsville*
	4	Area Code 304 - Cameron, Follansbee, Wellsburg

- Notes:
  Some local telephone service companies' local calling area may differ from the above. Contact your local telephone service company for more specific local calling area information.
- Calling prefixes associated with exchange areas listed above are shown below.

  Although we make every effort to maintain the accuracy of these lists, the ever-changing nature of the telephone industry makes it impossible for us to ensure 100% accuracy. Please call our business office about any billing discrepancies you may encounter.
- No charge for calls to this prefix for Community Plus Caller Service. See description of Community Plus Caller Service On page 10.

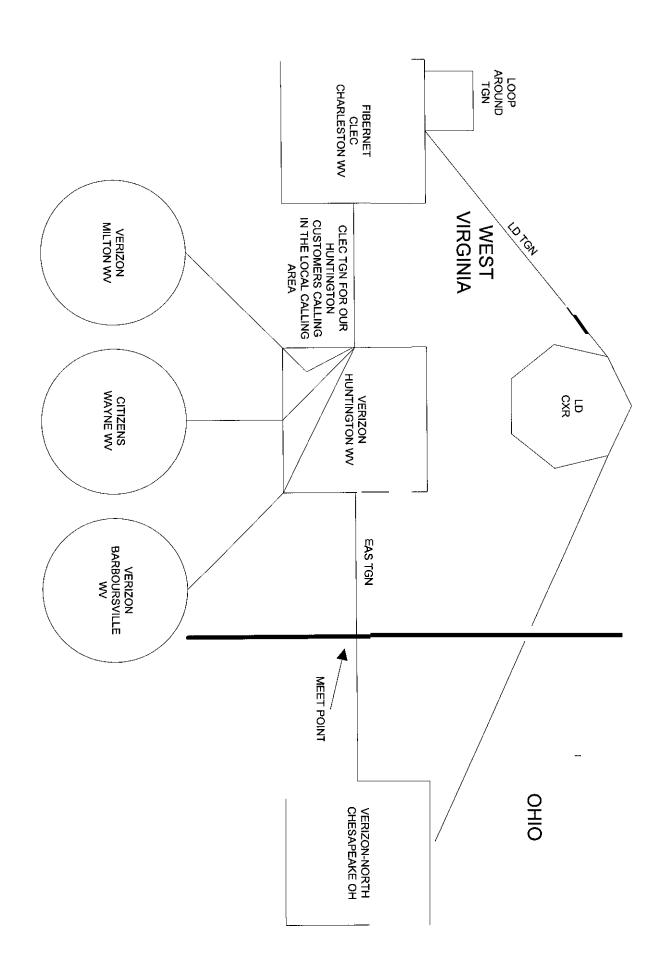
#### Exchanges and Calling Prefixes – Area Codes 304 & 740

Exchange         Code           Beech Bottom         394, 407           Bethany         408, 829           Cameron         686           Foliansbee         505, 527           Moundsville         221, 843, 845
Beech Bottom       394, 407         Bethany       408, 829         Cameron       686         Foliansbee       505, 527         Moundsville       221, 843, 845
Bethany       408, 829         Cameron       686         Foliansbee       505, 527         Moundsville       221, 843, 845
Camerón       686         Follansbee       505, 527         Moundsville       221, 843, 845
Foliansbee
Moundsville
New Martinsville
Triadelphia219, 547
Weirton
Wellsburg605,737

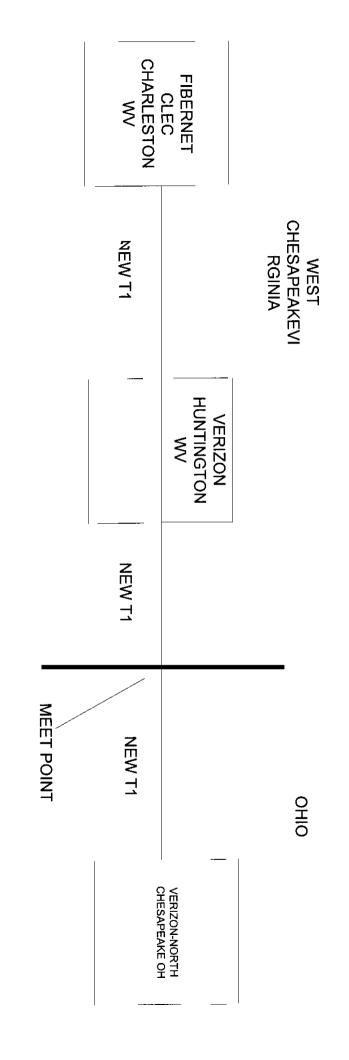
### Area Code 304

Exchange	Code
West Liberty	217. 336
Wheeling	
	234, 238, 242, 243, 277, 551, 559, 716
Area Code 740	
Exchange	Code
Bellaire, OH	
Bridgeport. OH	
Martins Ferry, OH	609, 633
St Clairsville OH	232, 526, 695, 699

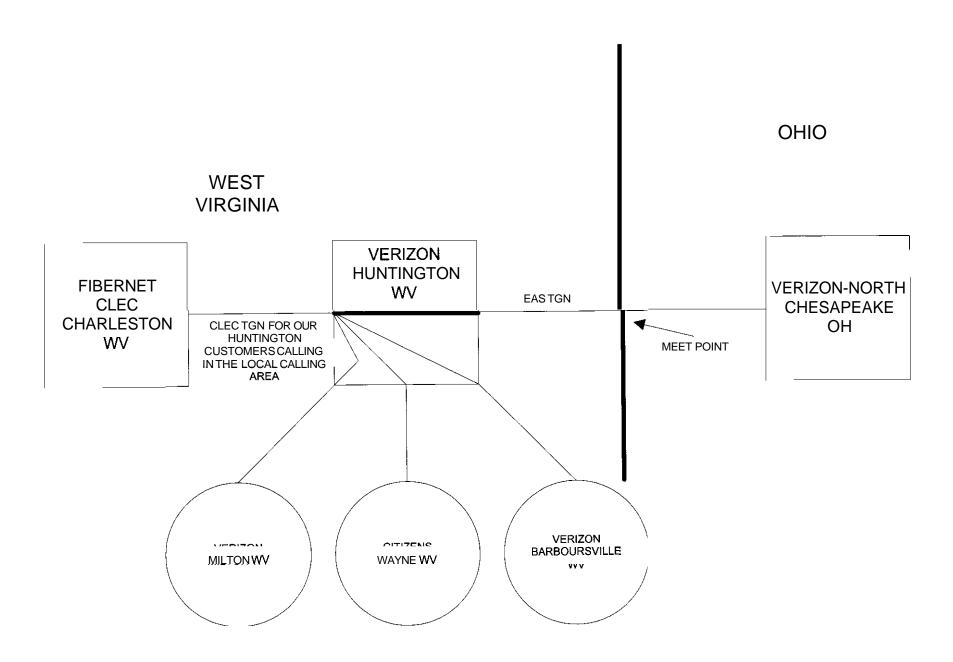
# ATTACHMENT 4 EAS NETWORK DIAGRAMS

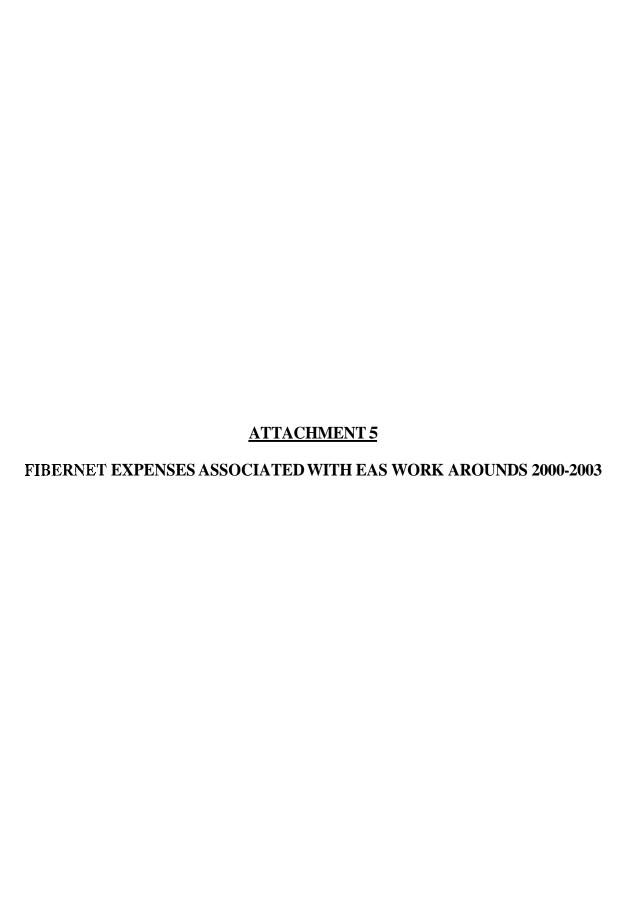


# HUNTINGTON WORK-AROUND



#### **DESIRED FIX**





# CROSS BOUNDRY DIALING EXPENSE

MONTH	AMOUNT
10/28/00	\$ 4,061.33
11/28/00	\$ 1,697.97
12/28/00	\$ 1,438.28
01/28/01	\$ 2,714.99
02/28/01	\$10,428.02
03/28/01	\$ 5,116.16
04/28/01	\$13,657.42
05/28/01	\$14,317.68
06/28/01	\$14,098.66
07/28/01	\$22,458.79
08/28/01	\$20,073.54
09/28/01	\$25,400.28
10/28/01	\$43,249.01
11/28/01	\$22,388.08*
12/28/02	\$11,074.18
01/28/02	\$11,183.64
02/28/02	\$13,772.20
03/28/02	\$12,854.14
04/28/02	\$13,43 1.08
05/28/02	\$13,5 18.44
06/28/02	\$14,108.64
07/28/02	\$13,565.76
08/28/02	\$11,846.90
09/28/02	\$12,404.86
10/28/02	\$11,020.62
11/28/02	\$12,296.18
12/28/02	\$11,976.12
TOTAL EXPENSE	\$364,152.97

 $<sup>^{\</sup>star}$  True-up of expense caused by move from Global Crossing to WorldCom / Lightyear as IXC provider.